

EXHIBIT I.11

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL)
5 PRESCRIPTION) MDL No. 2804
6 OPIATE LITIGATION)
7 _____) Case No.
8) 1:17-MD-2804
9)
10 THIS DOCUMENT RELATES) Hon. Dan A.
11 TO ALL CASES) Polster
12)

13 WEDNESDAY, APRIL 24, 2019

14 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
15 CONFIDENTIALITY REVIEW

16 - - -

17 Videotaped deposition of Anna
18 Lembke, M.D., held at the offices of Lief
19 Cabraser Heimann & Bernstein, LLP, 275
20 Battery Street, 29th floor, San Francisco,
21 California, commencing at 8:07 a.m., on the
22 above date, before Carrie A. Campbell,
23 Registered Diplomat Reporter and Certified
24 Realtime Reporter.

25 - - -

26 GOLKOW LITIGATION SERVICES
27 877.370.3377 ph | 917.591.5672 fax
28 deps@golkow.com

1 Henry Schein, do you know if they're a
2 defendant in this case?

3 A. I don't recall.

4 Q. Miami-Luken?

5 A. I don't recall.

6 Q. Anda?

7 A. I don't recall.

8 Q. Earlier today you said that you
9 acknowledged the distributors' contribution
10 to the opioid epidemic; is that right?

11 A. Yes.

12 Q. Okay. Are you prepared to
13 offer an opinion in this litigation
14 concerning the contribution of any
15 distributor to the opioid epidemic?

16 A. It's my opinion -- it's my
17 understanding that other expert witnesses
18 will be offering testimony on distributors.
19 I've not been asked to offer testimony on
20 that.

21 Q. Okay. And so when you
22 referenced the pharmaceutical opioid industry
23 in your report, are distributor defendants
24 included in that insofar as -- strike all
25 that.

1 You mentioned the
2 pharmaceutical opioid industry in your
3 report, and you told Mr. Lavelle that as you
4 define that term, it includes manufacturers,
5 distributors and pharmacies; is that right?

6 A. That's right.

7 Q. When you reference misleading
8 or false marketing material and attribute it
9 to the pharmaceutical opioid industry in your
10 report, are you referring to the distributors
11 that have been named as defendants in this
12 case?

13 A. No.

14 Q. And in preparing your report,
15 did you consider any documents that were
16 produced by a distributor that is named as a
17 defendant in this case?

18 A. No.

19 Q. Do you have any training or
20 expertise in supply chain management?

21 A. No.

22 Q. Do you have any training or
23 expertise in the distribution of controlled
24 substances?

25 A. No.